



**SEALED**

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

-oOo-

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**BRAD A.K. IVESTER,  
PEDRO FRANCIS PEBENITO,  
aka Pia, and  
MANUEL ALBERT PEREZ,**

**Defendants.**

) **SEALED**  
) **CRIMINAL INDICTMENT**  
)  
) **Case No.: 2:13-cr- 365**  
) **VIOLATIONS:**  
) 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) –  
) Conspiracy to Distribute a Controlled  
) Substance; 21 U.S.C. §§ 841(a)(1) and  
) (b)(1)(A) – Distribution of a Controlled  
) Substance  
)  
)

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

**Conspiracy to Distribute a Controlled Substance**

Beginning from a time unknown, and continuing up to and including June 28, 2013, in  
the State and Federal District of Nevada,

**BRAD A.K. IVESTER, PEDRO FRANCIS PEBENITO,  
and MANUEL ALBERT PEREZ**

defendants herein and others known to the grand jury, did knowingly and intentionally combine,  
conspire, confederate and agree with individuals known and unknown to distribute 50 grams or  
more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21,  
United States Code, Sections 846 and 841(a)(1) and (b)(1)(A).

**COUNT TWO**

Distribution of a Controlled Substance

On or about August 18, 2011, in the State and Federal District of Nevada,

**BRAD A.K. IVESTER**

defendant herein, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**COUNT THREE**

Distribution a Controlled Substance

On or about October 19, 2011, in the State and Federal District of Nevada,

**BRAD A.K. IVESTER**

defendant herein, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**COUNT FOUR**

Distribution of a Controlled Substance

On or about May 30, 2012, in the State and Federal District of Nevada,

**MANUEL ALBERT PEREZ**

defendant herein and another known to the grand jury, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**COUNT FIVE**

**Distribution of a Controlled Substance**

On or about June 26, 2013, in the State and Federal District of Nevada,

**MANUEL ALBERT PEREZ**

defendant herein, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**DATED:** this 24th day of September, 2013.

**A TRUE BILL:**

/S/

FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN  
United States Attorney

  
SUSAN CUSHMAN  
Assistant United States Attorney